

**UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT**

THE OHIO EDISON COMPANY, ET AL.)	
)	
Petitioners/Cross-Respondents,)	
)	
v.)	Case Nos. 15-1929, 15-1783
)	
NATIONAL LABOR RELATIONS)	
BOARD)	
)	
Respondent/Cross-Petitioner.)	

**ANSWER TO RESPONDENT’S
CROSS APPLICATION FOR ENFORCEMENT**

Pursuant to Rule 15(b)(2) of the Federal Rules of Appellate Procedure, Petitioners/Cross-Respondents Ohio Edison Company, a Wholly Owned Subsidiary of FirstEnergy Corp. and FirstEnergy Generation Corp. aka FirstEnergy Generation LLC, hereby answer Respondent/Cross-Petitioner National Labor Relations Board’s Cross-Application for Enforcement of an Order issued on May 21, 2015 in Board Case Nos. 08-CA-099595 and 06-CA-092312, reported at 362 NLRB No. 88, as follows:

1. Petitioners/Cross-Respondents admit that on July 1, 2015, they filed a petition with this Court to review the Decision and Order of the National Labor Relations Board (“NLRB”) in Board Case Nos. 08-CA-099595 and 06-CA-092312,

reported at 362 NLRB No. 88.

2. Petitioners/Cross-Respondents deny that the NLRB is entitled to enforcement of its Order.

3. Petitioners/Cross-Respondents deny that this Court has jurisdiction over the NLRB's cross-application.

4. Petitioners/Cross-Respondent's admit venue is proper in this Circuit.

WHEREFORE, Petitioners/Cross-Respondents respectfully request that this Court deny the NLRB's Cross-Application for Enforcement of its Order and grant Petitioners/Cross-Respondents relief as is just and proper, including the relief sought in the Petition for Review.

Respectfully submitted,

/s/ Nick A. Nykulak
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Counsel for Petitioners/Cross-Respondents

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 31, 2015, the forgoing Answer to Respondent's Cross-Application for Enforcement was served on the following via the CM/ECF system:

Linda J. Dreeben
Kira Dellinger Vol
Marni von Wilpert
National Labor Relations Board
Appellate and Supreme Court Litigation Branch
1015 Half Street, S.E.
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/s/ Nick A. Nykulak
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